Supreme Court, U.S.
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No. 88-1312

In The

Supreme Court of the United States

October Term, 1988

ESTATE OF ARCHIBALD CORNETT, ET AL,

Petitioners,

vs.

ESTATE OF M. D. SIKES, ET AL,

Respondents.

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI BY TEXACO OIL COMPANY

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CERTIFICATE

The undersigned, counsel of record for respondent, Texaco Oil Company, certifies that the following listed parties have an interest in the outcome of this case. These representations are made in order that judges of this court may evaluate possible disqualification or recusal pursuant to Rule 21.1(b), *Rules of the Supreme Court of the United States.*

1. Estate of Archibald Cornett.
2. Estate of Sally Williams Cornett.
3. Jenny Cornett-German.

4. Lillian German-Benjamín.
5. Carrie Armstrong.
6. Huey German.
7. Jesse E. German.
8. Annie M. Jones.
9. Shirley J. German.
10. Michael German.
11. Joe German.
12. Tommie German.
13. Jennie L. Johnson.
14. Bobbie J. Banks.
15. Roy J. German.
16. Le Otis Thomas.
17. Sandra Felder.
18. Clarissa Hudson.
19. Kelly Jackson, Sr.
20. Beulah M. Curtis.
21. Gwendolyn Pipkin.
22. Kimberly Pipkin.
23. Donna Pipkin.
24. Eva Jean Pipkin.
25. Sallie McMillons.
26. Raymond Pipkin.
27. Judy Pipkin.
28. Steve Pipkin.
29. Eva Pipkin.
30. Hilda Pipkin.
31. Mandy O'Gilvie Williams.
32. Thomas Pipkin.
33. Melvina Tucker.
34. Ruth Pipkin Yadell.
35. Jim Payton.
36. Julie Payton Duncan.
37. Betty Payton.
38. Bailey Payton.
39. Mary Nell Payton.
40. Alton Cornett.
41. Willie Cornett.
42. Vernon Cornett.
43. Bernice Washington.

44. Lee A. Cornett.
45. Robert Cornett.
46. Leona Portley.
47. Leola Cornett Bars.
48. John A. Cornett.
49. Bernice Jones.
50. Archie Cornett.
51. Sallie Mae Cornett.
52. Gates Cornett.
53. Jewel Cornett.
54. Marvis McMillons.
55. Vernice Thomas.
56. Bogus Cornett.
57. Velma Cornett Grasple.
58. Ruby Cornett Hall.
59. Charles Daughtery.
60. Ollie Tucker Hollins.
61. Newt Tucker.
62. Blanchard Tucker.
63. Linda Cornett.
64. Levada Cornett.
65. Robert Louis Cornett.
66. David Earl Cornett.
67. Audrey Cornett Hines.
68. Ada Cornett.
69. Laura Mae Allen.
70. Perry O'Gilvie.
71. Estate of M. D. Sikes.
72. Claude (HC) Foshee.
73. Ann Lewis Rives.
74. Louis Werner Saw Mill Co., its successors and assigns.
75. County of Panola, Texas.
76. "Texaco Oil Company", the name under which the present respondent was sued.[1]

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[1] The actual owner of the properties in question is Texaco Producing, Inc. That corporation is a subsidiary of Texaco, Inc. Subsidiaries of Texaco, Inc., and Texaco Producing, Inc., are shown in Appendix B.

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BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI BY TEXACO OIL COMPANY

TO THE HONORABLE SUPREME COURT OF THE UNITED STATES:

Texaco Oil Company, a defendant in the trial court, responds, as follows, to a petition for writ of certiorari in a civil rights case that was disposed of by summary judgment by reason of bar by the appropriate statute of limitations:

STATEMENT OF THE CASE

The unreported opinion of the United States Court of Appeals for the Fifth Circuit contains a statement of the proceedings and disposition below. It is correct.

The seven-page "Statement Of The Case" in the petition (Petition 3-9) contains no references to the record. See Rule 34.1(g), *Rules of the Supreme Court of the United States*. By and large, that statement depends upon the "allegations" in petitioner's complaint. It does not deal with or respond to the "facts" in the summary judgment record upon which the case was decided by both courts below.

The forthcoming argument is predicated specifically upon "facts" in the summary judgment record, predominantly "admissions" by petitioners in the trial court.[1]

SUMMARY OF ARGUMENT

In support of the judgments below, Texaco will argue:

1. Under the rule of *Burnett v. Grattan*, 104 S.Ct. 2924, 468 U.S. 42, 47, 82 L.Ed.2d 36, 43 (1984), we look to the common law of Texas for the applicable statute of limitations.

2. Since the civil rights acts redress injuries in the nature of "torts", the most appropriate Texas statute of limitations is its two-year statute for bringing personal injury suits, although the summary judgment record would satisfy the Texas four-year statute as well.

---

[1] "R" references are to the official record filed in the court of appeals. Rule 34.1(g), *Rules of the Supreme Court of the United States*.

3. The appropriate accrual date is the time when petitioners had knowledge of the injury sought to be redressed in this suit.

4. The summary judgment establishes conclusively the following:

(a) Petitioners hired an attorney in 1959 to reclaim the property for them. They were thus aware of their lack of title at that time.

(b) Petitioners' attorney confessed, in written representations, that the heirs' claim to title was rooted in fraud practiced upon them by reason of their race. Thus, they were aware at this time, also, of the civil rights nature of their injury.

(c) In response to interrogatories, petitioners conceded that, no later than 1974, they knew they were being victimized by purported conduct of government officials of Panola County which, if true, ostensibly had petitioners' race as its motivation and thus was facially illegal. If this conduct had any deterrent effect that prevented the filing of this suit, that effect ceased, according to petitioners' own discovery admissions, no later than December 31, 1973.

(d) Ergo, as early as January 1, 1974, the heirs had knowledge of a title defect, knowledge of racial discrimination against them, and an unfettered right to bring the present suit. Their delay of more than ten years conclusively invokes the bar of the appropriate Texas statute of limitations.

PROLOGUE

Texaco is one of several respondents. So far as Texaco can determine, it has been joined in this suit because it has a minor, essentially dormant leasehold interest in real property that would be affected if the district court had granted full relief prayed for by petitioners. (See R. 142.) Texaco can locate only a single, generic reference in the petition to the cause of action against any non-governmental parties.[2]

Petitioners have not cited any summary judgment evidence, and Texaco is aware of no evidence, that it participated in any of the conduct by which petitioners claim deprivation of personal, property, or civil rights.

REASONS WHY THE WRIT SHOULD BE DENIED

Judgment has been rendered by reason of bar by the statute of limitations applicable to the federal statutes under which the action was brought – 42 *U.S.C.*, §§ 1981-1983, §§ 1985-1986, and § 1988. (R. 203, et seq.) Elements that determine proper application of the statute of limitations are: (i) the appropriate statute, (ii) the accrual date, and (iii) facts which commenced the statute. We discuss each of those as follows:

---

[2] "Petitioners specifically alleged race, interracial association and previous condition of servitude to be at the core of this civil action and as the affirmative links to all unconstitutional actions and inactions intentionally directed at Petitioners . . . relative to private citizens' actions as far as individual, non-governmental Respondents and their predecessors in title, interest or office are concerned." (Petition 4-5.)

1.

The governing statute of limitations is borrowed from Texas law.

The civil rights acts under which petitioners sue " * * * do not contain a specific statute of limitations * * * . " *Wilson v. Garcia*, 105 S.Ct. 1938, 471 U.S. 261, 266, 85 L.Ed.2d 254, 260 (1985). The applicable statute of limitations, thus, is determined by the " * * * three-step process * * * " mandated by 42 *U.S.C.*, § 1988, for the purpose of " * * * borrow(ing) an appropriate rule * * * " from a pertinent corpus of statutory law. *Burnett v. Grattan*, 104 S.Ct. 2924, 468 U.S. 42, 48, 82 L.Ed.2d 36, 43 (1984). That process is described thus in *Burnett*, supra:

> " * * * First, courts are to look to the laws of the United States 'so far as such laws are suitable to carry [the civil and criminal civil rights statutes] into effect.' Ibid. If no suitable federal rule exists, the courts undertake the second step by considering application of state 'common law, as modified and changed by the constitution and statutes' of the forum State. Ibid. A third step asserts the predominance of the federal interest: Courts are to apply state law only if it is not 'inconsistent with the Constitution and laws of United States.' * * * " (468 U.S. 47-48, 82 L.Ed.2d 43.)

This court has recognized that, as a general rule, Congress intends, when federal statutes are silent on the issue of limitations, the appropriate " * * * statutes of limitations are to be borrowed from state law. * * * " *Reed v. United Transportation Union*, 109 S.Ct. 621, 57 U.S.L.W. 4088 (1989). This is true of actions under the civil rights acts. *Burnett v. Grattan*, supra.

The case of *Wilson v. Garcia*, supra, holds that civil rights actions, like the present, " * * * are best characterized as personal injury actions * * * ". (471 U.S. 280, 85 L.Ed.2d 269.) The reason why was stated thus:

> "The atrocities that concerned Congress in 1871 plainly sounded in tort. Relying on the premise we have found tort analogies compelling in establishing the elements of a cause of action under § 1983 . . . and in identifying the immunities available to defendants * * * . * * * As we have noted, however, the § 1983 remedy encompasses a broad range of potential tort analogies, from injuries to property to infringements of individual liberty."

> "Among the potential analogies, Congress unquestionably would have considered the remedies established in the Civil Rights Act to be more analogous to tort claims for personal injury than, for example, to claims for damages to property or breach of contract. * * * " (471 U.S. 277, 85 L.Ed.2d 267.)

Substantial federal authority has determined that a two-year statute of limitations is neither inimical to the purposes of, nor an inhibition upon, the rights secured by the Civil Rights Acts. (42 *U.S.C.*, § 1981, et seq.) As to such federal court actions brought within the territorial limits of Texas, it has been determined that Texas' two-year statute of limitations for bringing personal injury suits is the " * * * most appropriate * * * " statute. See: *Peter Henderson Oil Co. v. City of Port Arthur, Texas*, 806 F.2d 1273 (5th Cir. 1987); *Longoria v. City of Bay City, Texas*, 779 F.2d 1136, 1137 (5th Cir. 1986), both of which involved a civil rights claim rooted in the deprivation of real property rights, just as does our case.

Texaco does not understand petitioners to dispute applicability of Texas' two-year statute. It notes, parenthetically, however, that Texas has only two general limitations periods – a two-year period and a four-year period. See § § 16.003-16.004, *Tex. Civ. Prac. & Rem. Code.* (Appendix A.) Texaco will demonstrate in the following argument that petitioners' suit was barred under either statute.

2.

This action accrued when petitioners knew, or had reason to know, of the injury for which they sue.

Though a state statute may determine the applicable limitations period, the accrual of the limitations period is a question of federal law. *Longoria v. City of Bay City, Texas*, 779 F.2d 1136, 1138 (5th Cir. 1986). That case aptly states the test for determining the "accrual" date, to wit:

> " * * * The federal standard used to determine the accrual of a section 1983 cause of action is that the cause of action accrues when the plaintiff knows or has reason to know of the *injury* which is the basis of the action. * * * " (779 F.2d 1138, emphasis added.)

As with the previous element, Texaco does not understand petitioners to contest this rule. We thus turn to application of the preceding rules to the summary judgment record:

3.

Petitioners' action fully accrued prior to 1974.

The summary judgment record establishes conclusively that petitioners' cause of action had accrued, and the applicable limitations period had begun to run, by January 1, 1974.[3] This is ascertainable from answers to requests for admissions and responses to interrogatories, in which petitioners confessed the following facts:

(i) As early as 1959 " * * * all the heirs of Archibald Cornett * * * ", i.e., the present petitioners (R. 1214, 1237), hired attorney William Conners of Houston, Texas, " * * * to assert a claim of title to said land * * * ". (R. 1214.) Thus, at that time, petitioners knew conclusively title was not vested in the Cornett estate.

(ii) An August 4, 1959, letter from Mr. Conners is confessed to be "true" (R. 1238) in the following particulars:

> "My clients are all the heirs of Archibald Cornett, and as such they assert a claim of title to said land, including the mineral fee."

---

[3] In advancing that contention, Texaco gives petitioners the benefit of every doubt and eschews the compelling argument that petitioners' pleadings, themselves, establish accrual as early as 1915.

For example, petitioners' allegations that " * * * the Cornetts [petitioners' predecessors in title] were driven out of Panola County, Texas by a legitimized terroristic force known as the Ku Klux Klan * * * " (R. 208) is virtually a concession that their predecessors in action had knowledge of the present civil rights injury at least by the time of Archibald Cornett's death in 1915. (R. 206.)

> "The record reflects a chain of title out of one Sikes and the Werner Sawmill Company. Sikes' claim is founded upon a deed from 'Aster' Cornett, dated October 1, 1902."
>
> * * * * *
>
> "The deeper I dig into the facts of this investigation the stronger my case appears. My clients *being colored*, there appears certain disturbing elements of a *conspiracy to defraud.*" (R. 1214, emphasis added.)

Those admitted facts establish conclusively not only knowledge of a title claim, but that a basis for petitioners' "injury" was a " * * * conspiracy to defraud * * * " (R. 1214) rooted in their race – the same allegations made here.

(iii) Later, in October of 1961, the heirs conveyed a 1/4th interest in the disputed property, and also gave power of attorney, to a Philander Neville, an Illinois attorney, to help them establish " * * * our rights to * * * " (R. 1221) and to " * * * reclaim the subject property. * * * " (R. 1244.) The heirs admit that, at that time, they " * * * knew that a problem existed with respect to the chain of title. * * * " (R. 1245.) Petitioners also admittedly knew at that time that someone other than a descendant of Archibald Cornett was claiming to own the property. (R. 1246.)

(iv) Prior to January of 1982, petitioners admittedly knew of the deed from "Aster" Cornett to M. D. Sikes, which is the instrument inimical to their claim of title. (R. 1239.)

(v) Lastly, the petitioners confessed that, before 1973, their attempts to examine the title documents pertaining to the original Cornett land grant were being met with

illegal conduct and threats of violence that had seeming racial motivation, to wit:

> " * * * plaintiffs were physically barred up to and including approximately 1973. Plaintiffs had to get *someone white* to inquire for them. Prior to 1971, family members on several occasions attempted to obtain information from the Deed Records in Panola County but were told either 'none existed for Archibald Cornett' or they were told to 'leave the premises and warned not to return or they would be met with bodily harm, *Negroes could not investigate themselves in the deed and tax records.*"
>
> "Subsequent to 1972, one family member, Ervin Pipkins (deceased) and a friend went to Panola County to research the records. They were told by the clerk attending the counter that they could not view the records. They were then instructed by another courthouse official to leave the courthouse or they would be met with physical harm and the high sheriff would get them." (R. 1242-1244, emphasis added.)

In sum, petitioners' admissions on the summary judgment record conclusively visit them with knowledge, no later than January 1, 1974, of the following:

(i) that another party was claiming the land they believed legitimately should have passed to them,

(ii) that the adverse title claim, according to their view, was false,

(iii) that the adverse title had been established or concealed through a conspiracy to defraud promulgated by reason of the heirs' race, and

(iv) that facially illegal, discriminatory conduct, rooted primarily in race, had been practiced upon them

by officials of Panola County in their attempt to research the status of the original Cornett land grant.

Petitioners' claim encompasses the following injuries: (i) loss of title through fraud or other illegal activity practiced because of the race of petitioners or their predecessors and (ii) denial of the petitioners'/heirs' rights, as equal citizens, to examine or otherwise have access to history of the title. Yet, the summary judgment record establishes conclusively that the Cornett heirs (the present petitioners) were fully aware at least ten years before filing the present action of each "injury" they claim to have suffered by violation of 42 *U.S.C.*, § 1981, et seq. Compare: *Cross v. Lucius*, 713 F.2d 153 (5th Cir. 1983).

4.

The summary judgment record renders ineffective any claim that the Texas statute was "tolled".

Petitioners' vague inference that the Texas limitation statute was "tolled" by reason of their being barred from the courthouse by Panola County officials is circuitous, if not self-defeating. The conduct of the Panola County officials is, in fact, the crux of petitioners' substantive claim. If the facts of a civil rights claimant's cause of action can successfully be alleged as a ground for "tolling", there is, then, no applicable statute of limitations; the substantive complaint and grounds for tolling would always merge.

To the extent that petitioners' reliance upon *Hohri v. United States*, 782 F.2d 227 (D.C. Cir. 1986), rev'd 107 S.Ct. 2246, 482 U.S. 64, 96 L.Ed.2d 51 (1987), obliquely or

inferentially, suggests fraudulent concealment of facts by respondents (certainly respondents other than Texaco) that prevented petitioners from learning of their claim, it is sufficient to say that such a basis for tolling, under Texas law, would be operative only until petitioners acquired the requisite knowledge the fraudulent concealment purportedly denied them. See: *Borderlon v. Peck*, 661 S.W.2d 907, 908 (Tex. 1983).

The summary judgment record more than adequately invokes that rule. The purported physical disbarment of petitioners from the courthouse was conceded by them to have terminated at least by January 1, 1974. (R. 1242.)[4] The previous discussion (pp. 8-11) establishes requisite knowledge of all other elements of petitioners' claim prior to January 1, 1974. This knowledge effectively removed any ground for tolling at that time and activated accrual of the appropriate statute of limitations.

CONCLUSION AND PRAYER

The facts upon which summary judgment was rendered are found either in "admissions" by petitioners or their own words answering interrogatories. The dictates of *Anderson v. Liberty Lobby*, 106 S.Ct. 2505, 477 U.S. 242, 91 L.Ed.2d 202 (1986) and *Celotex Corporation v. Catrett*, 106 S.Ct. 2548, 477 U.S. 317, 91 L.Ed.2d 265 (1986), are not implicated. This is not a battle of opposing affidavits or conflicting answers, nor does it involve assessment of credibility. The issue here involves the legal implications

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[4] " * * * Plaintiffs were physically barred up to and including approximately 1973. * * * " (R. 1242.)

of facts petitioners admit exist. The cases cited fully condone summary judgment in that context.

WHEREFORE, PREMISES CONSIDERED, Texaco Oil Company, prays that the petition for writ of certiorari herein be denied forthwith. Texaco additionally prays for such other and further relief to which it may justly be entitled at law or in equity.

Respectfully submitted,

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APPENDIX A

Sec.
16.066. Action on Foreign Judgment.
16.067. Claim Incurred Prior to Arrival in this State.
16.068. Amended and Supplemental Pleadings.
16.069. Counterclaim or Cross Claim.
16.070. Contractual Limitations Period.
16.071. Notice Requirements.
16.072. Saturday, Sunday, or Holiday.

SUBCHAPTER A.
LIMITATIONS OF PERSONAL ACTIONS

§ 16.001. Effect of Disability

(a) For the purposes of this subchapter, a person is under a legal disability if the person is:

(1) younger than 18 years of age, regardless of whether the person is married; or

(2) of unsound mind.

(b) If a person entitled to bring a personal action is under a legal disability when the cause of action accrues, the time of the disability is not included in a limitations period.

(c) A person may not tack one legal disability to another to extend a limitations period.

(d) A disability that arises after a limitations period starts does not suspend the running of the period.

Acts 1985, 69th Leg., ch. 959, § 1, eff. Sept. 1, 1985. Amended by Acts 1987, 70th Leg., ch. 1049, § 56, eff. Sept. 1, 1987.

Section 65 of the 1987 amendatory act provides:

"(a) A period of limitations that on August 31, 1987, was tolled under Section 16.001 or 16.022, Civil Practice and Remedies Code, because the person entitled to bring the action was imprisoned, begins to run on the effective date of this Act.

"(b) A period before the effective date of this Act during which a person was under a legal disability because of imprisonment is not affected by this Act."

§ 16.002. One-Year Limitations Period

A person must bring suit for malicious prosecution, libel slander, or breach of promise of marriage not later than one year after the day the cause of action accrues.

Acts 1985, 69th Leg., ch. 959, § 1, eff. Sept. 1, 1985.

§ 16.003. Two-Year Limitations Period

(a) A person must bring suit for trespass for injury to the estate or to the property of another, conversion of personal property, taking or detaining the personal property of another, personal injury, forcible entry and detainer, and forcible detainer not later than two years after the day the cause of action accrues.

(b) A person must bring suit not later than two years after the day the cause of action accrues in an action for injury resulting in death. The cause of action accrues on the death of the injured person.

Acts 1985, 69th Leg., ch. 959, § 1, eff. Sept. 1, 1985.

§ 16.004. Four-Year Limitations Period

(a) A person must bring suit on the following actions not later than four years after the day the cause of action accrues:

(1) specific performance of a contract for the conveyance of real property;

(2) penalty or damages on the penal clause of a bond to convey real property; or

(3) debt.

(b) A person must bring suit on the bond of an executor, administrator, or guardian not later than four years after the day of the death, resignation, removal, or discharge of the executor, administrator, or guardian.

(c) A person must bring suit against his partner for a settlement of partnership accounts, and must bring an action on an open or stated account, or on a mutual and current account concerning the trade of merchandise between merchants or their agents or factors, not later than four years after the day that the cause of action accrues. For purposes of this subsection, the cause of action accrues on the day that the dealings in which the parties were interested together cease.

Acts 1985, 69th Leg., ch. 959, § 1, eff. Sept. 1, 1985.

§ 16.005. Action for Closing Street or Road

(a) A person must bring suit for any relief from the following acts not later than two years after the day the cause of action accrues:

(1) the passage by a governing body of an incorporated city or town of an ordinance closing and abandoning, or attempting to close and abandon, all or any part of a public street or alley in the city or town, other than a state highway; or

(2) the adoption by a commissioners court of an order closing and abandoning, or attempting to close and abandon, all or any part of a public road or thoroughfare in the county, other than a state highway.

(b) The cause of action accrues when the order or ordinance is passed or adopted.

(c) If suit is not brought within the period provided by this section, the person in possession of the real property receives complete title to the

* * *

APPENDIX B

TEXACO INC. SUBSIDIARIES AS OF JUNE 1988

Bay Drilling Corporation
Bridgeline Gas Distribution Company
El Capitan Mutual Water Company
Getty Capital Corporation
Harrison Capital Inc.
Harrison Corporation, The
  Boca Del Mar Inc.
  Texaco Boca Del Mar Inc.
Getty Oil Company
Getty Oil International (Caribbean) N.V.
Getty Timberlands Inc.
Neches Gas Distribution Company
Paragon Oil Company, Inc.
Riverway Gas Pipeline Company
Sabine Pipe Line Company
Seaboard Oil Company
Texaco Canada Inc.
  Canadian Reserve Oil and Gas Ltd.
  Great Eastern Oil Ltd.
  McColl-Frontenac Oil Co. Ltd.
  Oilship Limited
  Texaco Canada Resources Ltd.
    Cynthia Gas Gathering Company Limited
    La Societe Acadienne de
      Recherches Petrolleres Ltd.
    380311 Alberta Limited
    Texaco Canada Enterprises Ltd.
    Texaco Canada Gas Enterprises Inc.
    Texaco Canada Properties, Inc.
  Tournemaine Realties Limited
Texaco Capital Inc.
Texaco Capital N.V.
Texaco Chemical Company
  Federal Chemical Company
  Seachem Pipeline Company

Texaco Chemical International Sales Corporation
Texaco Chemical International Trader Inc.
Texaco Chemical Pipeline Company, Inc.
Texas Chemical Company
Texaco Development Corporation
Texaco Exploration Properties Inc.
Texaco Financial Services Inc.
Texaco Fourbear Inc.
Texaco Harvest Gas Pipeline Company Inc.
Texaco Harvest Pipeline Company Inc.
Texaco Mineral Company
Texaco Producing Inc.
Texaco Properties Inc.
Texaco Refining and Marketing Inc.
Texaco Overseas Holdings Inc.
Texaco Trading and Transporation Inc.
Texaco Syngas Inc.
Texaco Tamarac Inc.
Texaco Timberlands Inc.
TXL Oil Corporation, The
Whitney Supply Company

TEXACO PRODUCING INC. SUBSIDIARIES
AS OF JUNE 1988

ACC Chemical Company
Chemplex Construction Corporation
Associated Oil Company
Basin Drilling Corp.
Getty Canadian Minerals, Limited
Getty Canadian Metals, Limited
Getty Chemical Company
Chemplex Construction Corporation
Getty Energy Company
Getty Gas Gathering, Inc.
Getty Mining Company
CP Water Company
Getty Canadian Mining Company
Getty Mining International Inc.
Getty Minerals Company, Limited

Getty Mines, Limited
Getty Mining Northwest, Limited
Getty Mining Pty. Ltd.
Hueiva Pyrites, Inc.
Seville Metals Corporation
Texaco Oil Development Company
Grande Properties, Inc.
Petrotomics Company
Getty Oil Exploration Company
Getty Scientific Development Company
Minnehoma Corporation
Minnehoma Develpment, Inc.
Nuclear Fuel Services, Inc.
Skelly Leasing Company
Vanply, Inc.
Vanply of Liberia, Inc.
Vancouver Plywood Co., Inc.
Snake River Gas Transmission Corp.
Texaco Alaska Inc.
Texaco Coalinga Energy Company
Texaco Cogeneration Company
Texaco Congeneration Gas Company
Texaco Gas Inc.
Texaco Gas Marketing, Inc.
Texaco Midway-Sunset Cogeneration Company
Texaco San Ardo Energy Company
Texaco Services Inc.
Texaco Sobel Cogeneration Company
Texaco Yoakum Energy Company
TPI Ventures Inc.
Wasco Gas Services, Inc.